

EXHIBIT B

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

THOMAS A. EAMES, ROBERTA L. EAMES	:	
and TAMMY EAMES, on behalf of	:	C.A. No. 04-CV-1324 KAJ
themselves and all others similarly situated	:	
Plaintiffs	:	
	:	
v.	:	
	:	
NATIONWIDE MUTUAL INSURANCE CO.	:	
Defendant.	:	

**NATIONWIDE MUTUAL INSURANCE COMPANY'S RESPONSES AND OBJECTIONS
TO PLAINTIFFS' FIRST SET OF
REQUESTS FOR PRODUCTION OF DOCUMENTS**

Comes now the defendant, Nationwide Mutual Insurance Company, (hereinafter "Nationwide"), and hereby serves Nationwide's Responses and Objections ("Response(s)") to Plaintiffs' First Set of Requests for Production of Documents. Nationwide's Response is without prejudice to Nationwide's pending Motion to Dismiss.

OBJECTIONS

Nationwide objects to the terms "refer to" and "characteristic" as being undefined by Plaintiffs in either the First Request for Production of Documents or the Complaint. The only legal and enforceable interpretation of these terms, pursuant to Nationwide's coverage obligations upon which Plaintiffs asserts a breach of contract, are those characterizations and references set forth only in the insurance policy and Declarations page which form part of the policy. No other reference or characterization is relevant to this action.

REQUEST NO. 1

All documents that refer to or characterize limits of liability for PIP coverage as "full".

RESPONSE NO. 1:

Nationwide refers Plaintiffs to the governing insurance policy and the corresponding declarations sheet applicable to the subject policy as the only and binding legal characterization of

the PIP policy limits provided by Nationwide in accordance with Delaware law. Nationwide further responds that it is not currently aware of any other documents that legally characterize the PIP policy limits responsive to this request and relevant to this action.

REQUEST NO. 2:

All documents that refer or relate to the characterization of limits of liability for PIP coverage as "full."

RESPONSE NO. 2:

Nationwide refers Plaintiffs to the governing insurance policy and the corresponding declarations sheet applicable to the subject policy as the only and binding legal characterization of the PIP policy limits provided by Nationwide in accordance with Delaware law. Nationwide further responds that it is not currently aware of any other documents that legally characterize the PIP policy limits responsive to this request and relevant to this action.

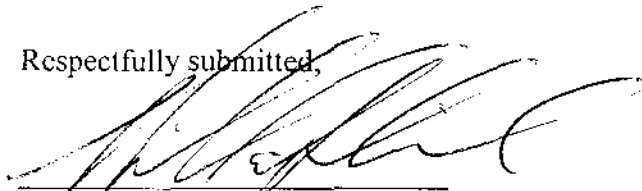
REQUEST NO. 3

All documents or other recorded material that refer or relate to the training, instruction or education of Nationwide's employees or agents (including without limitation insurance agents) with respect to the characterization of PIP limits as "full."

RESPONSE NO. 3:

None.

Respectfully submitted,



Nicholas E. Skiles, Esquire
Delaware Bar No. 3777
300 Delaware Avenue, Suite 1130
Wilmington, DE 19899
(302) 656-5935
Attorneys for Defendant,
Nationwide Mutual Insurance Company